## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

| IN RE INTEL CORPORATION  | ) |                                    |
|--------------------------|---|------------------------------------|
| MICROPROCESSOR ANTITRUST | ) | MDL Docket No. 05-MD-1717-JJF      |
| LITIGATION               | ) | Civil Action No. 1:05-CV-00485-JJF |

# MOTION FOR CONSOLIDATION AND FOR APPOINTMENT OF CO-LEAD COUNSEL AND LIAISON COUNSEL

Pursuant to Rules 23(g) and 42(a) of the Federal Rules of Civil Procedure, certain Plaintiffs through their undersigned counsel respectfully move the Court for an order (i) consolidating all purchaser antitrust actions pending against Intel Corporation<sup>1</sup> for pretrial purposes pursuant to the JMPL Transfer Order for Docket No. 1717, dated Nov. 8, 2005; (ii) appointing Cohen, Milstein, Hausfeld & Toll, P.L.L.C., The Furth Firm LLP, Saveri & Saveri, Inc. and Berman Sobol & Shapiro LLP as Co-Lead Counsel in the consolidated action and any subsequently filed related cases; and (iii) appointing Prickett, Jones & Elliott, P.A. as Liaison Counsel. The grounds for this Motion are set forth in the accompanying Memorandum of Law in support thereof.

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<sup>&</sup>lt;sup>1</sup> Attached hereto as Exhibit A is a list of all the pending purchaser antitrust actions in the District of Delaware for which this motion seeks consolidation.

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| LITIGATION               | j |   |

### STATEMENT PURSUANT TO LOCAL RULE 7.1.1

The undersigned counsel for the moving plaintiffs hereby certifies, with respect to the consolidation of these cases, that issue was taken up with the Judicial Panel on Multidistrict Litigation. Furthermore, the undersigned counsel has discussed the Motion for Appointment of Lead Counsel with counsel for the class plaintiffs identified herein. Counsel did not discuss the Motion for Appointment of lead counsel with counsel for defendants since they will take no position on the Motion. All counsel have received notice of the within motion.

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Dated: November 10, 2005

## **CERTIFICATE OF SERVICE**

I, James L. Holzman, hereby certify that on this 10th day of November, 2005, the foregoing Motion for Consolidation and for Appointment of Co-Lead Plaintiff and Liaison Counsel was served on counsel for the following parties as indicated below:

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